

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

C.A. NO. 04CV1704RWZ

2004 APR 28 A 11:43

U.S. DISTRICT COURT
DISTRICT OF MASS.

JOHN J. BAUGHAN,

Plaintiff

v.

TOWN OF WESTPORT, KEITH
PELLETIER, TODD OLIVER, FRANCOIS
NAPERT, SCOTT ARRINGTON, MICHAEL
R. HEALY, STUART KIRKALDY, JAMES J.
LONG, MARJORIE A. HOLDEN, CHARLES
A. COSTA, RUSSELL T. HART and
STEPHEN OULLETTE,

Defendant

DEFENDANTS' MOTION FOR
ENLARGEMENT OF TIME TO
RESPOND TO COMPLAINT

Now come the defendants, and hereby move this Honorable Court for a 30-day enlargement of the time within which the defendants may respond to the plaintiff's Complaint.

As grounds therefor, the defendants state as follows:

1. The plaintiff's Complaint was served on or about April 13, 2004, and the defendants' response thereto would therefore be due on or about May 3, 2004.
2. The plaintiff's Complaint contains twenty-three (23) counts against thirteen (13) defendants, and the additional time requested is necessary to prepare a meaningful response to the lengthy Complaint.
3. In addition, the requested extension is necessary to resolve questions as to the joint representation of the individual defendants. For purposes of the within motion only, the undersigned hereby specially appears for the individual defendants pending resolution these issues regarding joint representation.

WHEREFORE, in view of the foregoing, the defendants respectfully request that the within motion be allowed, and that the defendants be granted a thirty-day extension (to June 3, 2004) of the time within which they may respond to the plaintiff's Complaint.

DEFENDANTS

By their attorneys,



Jonathan M. Silverstein (BBO# 630431)

Jackie Cowin (BBO# 655880)

Kopelman and Paige, P.C.

Town Counsel

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CERTIFICATE OF SERVICE
I hereby certify that a true copy of the
above document was served upon the
attorney of record for each other party
by mail-hand on 4/27/04
